
**Explanatory document for the Nordic synchronous area proposal for
ramping restrictions for active power output in accordance with
Article 137(3) and (4) of the Commission Regulation (EU) 2017/1485
of 2 August 2017 establishing a guideline on electricity transmission
system operation**

1. Introduction

The Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation (hereinafter “**SO Regulation**”) sets out rules on relevant subjects that should be coordinated between Transmission System Operators, as well as between TSOs and Distribution System Operators and with significant grid users, where applicable. The goal of the SO Regulation is to ensure provision of an efficient functioning of the interconnected transmission systems to support all market activities. In order to deliver these objectives, a number of steps are required.

One of these steps is to define the ramping restrictions for active power output for the Nordic LFC Block. Pursuant to Article 119(1)(c) of the SO Regulation, all Transmission System Operators in the Nordic LFC Block shall jointly develop common proposals for ramping restrictions for active power output in accordance with Article 137(3) and (4).

According to Article 6(3)(e)(i) of the SO Regulation the proposal for ramping restrictions for active power output in accordance with Article 137(3) and (4) (hereafter referred to as “**Proposal**”) shall be submitted for approval by the relevant national regulatory authorities (hereinafter “NRAs”) no later than 14 September, 2018. The Proposal is submitted for regulatory approval to all NRAs in the Nordic LFC block. According to Article 6(6) of the SO Regulation the Proposal needs to be submitted to ACER as well, who may issue an opinion on the Proposal if requested by the NRAs.

This document contains an explanation of the Proposal from all TSOs of the Nordic synchronous area (hereinafter “**TSOs**”). It is structured as follows. The legal requirements for the Proposal are presented in Chapter 2. Chapter 3 starts with describing the objective of the ramping restrictions. Chapter 4 provides an overview of the existing situation and Chapter 5 an outlook to future developments. The proposed ramping restrictions are described in Chapter 6. Chapter 7 describes the expected impact on the relevant objectives of the SO Regulation. Finally, Chapter 8 provides the timeline for implementation and Chapter 9 describes the public consultation.

2. Legal requirements and interpretation

2.1 Legal references and requirements

Several articles in the SO Regulation set out requirements which the Proposal must take into account. These are cited below.

- (1) Article 119(1)(c) and (2) of the SO Regulation constitutes the legal basis that the Proposal should take into account. Article 119 has the following content:

“1. By 12 months after entry into force of this Regulation, all TSOs of each LFC block shall jointly develop common proposals for:[...]

(c) ramping restrictions for active power output in accordance with Article 137(3) and (4); [...]

2. All TSOs of each LFC block shall submit the methodologies and conditions listed in Article 6(3)(e) for approval by all the regulatory authorities of the concerned LFC block. Within 1 month after the approval of these methodologies and conditions, all TSOs of each LFC block shall conclude an LFC block operational agreement which shall enter into force within 3 months after the approval of the methodologies and conditions”

- (2) Article 137(3) and (4) of the SO Regulation has the following content:

“3. All connecting TSOs of an HVDC interconnector shall have the right to determine in the LFC block operational agreement common restrictions for the active power output of that HVDC interconnector to limit its influence on the fulfilment of the FRCE target parameter of the connected LFC blocks by agreeing on ramping periods and/or maximum ramping rates for this

HVDC interconnector. Those common restrictions shall not apply for imbalance netting, frequency coupling as well as cross-border activation of FRR and RR over HVDC interconnectors. All TSOs of a synchronous area shall coordinate these measures within the synchronous area.

4. All TSOs of an LFC block shall have the right to determine in the LFC block operational agreement the following measures to support the fulfilment of the FRCE target parameter of the LFC block and to alleviate deterministic frequency deviations, taking into account the technological restrictions of power generating modules and demand units:

(a) obligations on ramping periods and/or maximum ramping rates for power generating modules and/or demand units;

(b) obligations on individual ramping starting times for power generating modules and/or demand units within the LFC block; and

(c) coordination of the ramping between power generating modules, demand units and active power consumption within the LFC block.”

(3) Article 6(3)(e)(i) of the SO Regulation states:

“The proposals for the following terms and conditions or methodologies shall be subject to approval by all regulatory authorities of the concerned region, on which a Member State may provide an opinion to the concerned regulatory authority: [...]

(e) methodologies and conditions included in the LFC block operational agreements in Article 119, concerning:

(i) ramping restrictions for active power output in accordance with Article 137(3) and (4);

2.2 Interpretation and scope of the Proposal

Article 137(3) of the SO Regulation provides the TSOs with the right to determine common restrictions for the active power output of that HVDC interconnector. These restrictions may impact both operation of the HVDC interconnectors and market exchanges over these interconnectors. Since Article 137(3) of the SO Regulation excludes applicability of the restrictions for imbalance netting, frequency coupling as well as cross-border activation of FRR and RR over HVDC interconnectors, the TSOs consider that only wholesale energy markets (day-ahead, intraday etc.) shall be affected by the restrictions.

Since the Nordic synchronous area only consists of one LFC block, the HVDC interconnectors to other LFC blocks are always HVDC interconnectors to other synchronous areas. The restrictions for the active power output of HVDC interconnectors between synchronous areas as referred to in Article 137(1) and (2) of the SO Regulation shall therefore be the same as the restrictions for the active power output of the HVDC interconnectors that are proposed in this Proposal.

Article 137(4) of the SO Regulation provides the TSOs with the right to determine ramping restrictions for power generating modules and demand units. Article 137(4)(a) and (b) allow defining obligations for power generating modules and/or demand units while Article 137(4)(c) allows the TSOs to actively coordinate between generating modules, demand units and active power consumption within the LFC block.

3. Objective of ramping restrictions for active power output

The objective of the ramping restrictions for active power output is to balance momentary generation, consumption and exchange over HVDC interconnectors and by that limit large FRCE and frequency deviations. This will contribute to that the frequency and FRCE quality target parameters are fulfilled. Consequently, the specified restrictions are required to ensure secure and efficient operation of the electricity transmission system.

4. The existing situation

In this chapter, the existing ramping restrictions for active power output are presented. Section 4.1 describes the existing ramping restrictions for HVDC interconnectors and section 4.2 describes the existing ramping restrictions for production plans. Section 4.3 describes the existing possibilities for the TSOs to coordinate ramping between production plans. Ramping of consumption is currently not restricted nor coordinated.

4.1 Existing restrictions for HVDC interconnectors

The trading plans on the HVDC interconnectors between the Nordic LFC block and other LFC blocks can potentially change so much from one hour to the next that the changes in power flows at the change of hours must be restricted to manage balance regulation and to stay within system security limits. Restrictions are placed on the gradient for change in flow and on changes to the trading plans from one hour to the next in the energy market. Table 1 provides an overview of these restrictions for the existing HVDC cables. The TSOs apply different ramping periods on the HVDC interconnectors.

Table 1: Existing restrictions for HVDC interconnectors

HVDC link	from	to	maximum gradient for change in flow (MW/min)	maximum changes to the trading plans from one hour to the next(MW)	
Baltic Cable	Sweden (SE4)	Germany	30	600	
Estlink 1	Finland	Estonia	30	600	
Estlink 2	Finland	Estonia	30		
Great Belt	Denmark (DK1)	Denmark (DK2)	30	600	
Kontek	Denmark (DK2)	Germany	30	600	
Konti-Skan 1	Sweden (SE3)	Denmark (DK1)	30	600	600 ¹
Konti-Skan 2	Sweden (SE3)	Denmark (DK1)			
Skagerrak 1	Norway (NO2)	Denmark (DK1)	30	600	
Skagerrak 2	Norway (NO2)	Denmark (DK1)			
Skagerrak 3	Norway (NO2)	Denmark (DK1)			
Skagerrak 4	Norway (NO2)	Denmark (DK1)			
NordBalt	Sweden (SE4)	Lithuania	30	600	
NorNed	Norway (NO2)	Netherlands	30	600	
SwePol	Sweden (SE4)	Poland	30	600	
Vyborg	Finland	Russia	30	600	

4.2 Existing ramping restrictions for production plans

The TSOs apply a ramping restriction on BRPs representing power generating modules in Finland, Norway and Sweden when their hourly production plan changes more than 200 MW at hour shift. In this case BRPs need to reschedule their plan with quarterly steps 15 minutes before hour shift, at hour shift and 15 minutes

¹ This sum limitation will be re-examined during implementation of the new Nordic balancing model.

after hour shift in order to adjust the plans to better correspond to the consumption pattern. In Norway, the steps can be applied 30 minutes before the hour shift until 30 minutes after the hour shift. The detailed terms and conditions are specified on national level. This obligation is not relevant in Denmark East due to the physical characteristics for production.

4.3 Coordinate ramping of production plans

Based on the planning information and real-time information, each TSO assesses the impact of ramping around hour shifts from a national perspective. In addition, Svenska kraftnät and Statnett assess whether the changes in production plans in the Nordic area and the HVDC exchange around hour shift will impact the system frequency in a way that cannot be entirely handled by control centres in the minutes before and after operating hour. If so there is a need to advance or delay parts of planned production steps at the hour shift. The power schedules may be changed from 30 minutes before hour shift till 30 minutes after the hour shift.

This coordination is mainly important during morning and evening hours and also around day shift. If the changes in the production plans are deemed to be too high, the TSOs make a coordinated plan on how to level out these changes by an agreement with BRPs that represent power generating modules to reschedule the production. In situations with congestions, there is also a need to decide in which order the rescheduling should take place. E.g. in case of close to congestion on Hasle from Norway to Sweden it may be wise to start with increased production in Sweden/Finland 15 minutes before hour shift and decreased production in Norway in the first 15 minutes after the hour shift². The volumes to be shifted after the hour might be reassessed closer to the hour shift if something unplanned occurs that would interfere with the initial plan.

5. Outlook

The restrictions for HVDC ramping discussed in section 4.1 above were determined on the basis that the total change for the Nordic synchronous system at one hour shift should not exceed an acceptable maximum level and this total level was evenly distributed on individual HVDC interconnectors. Recent and future development with increased number of HVDC connections, changed flow pattern and the introduction of an ISP of 15 minutes requires that the limits, ramping periods and the methodology to determine these limits are re-evaluated in the new Nordic balancing model development process. In the same process, the restrictions and coordination of production plans discussed in section 4.2 and 4.3, will be assessed.

6. Proposal for ramping restrictions

The existing ramping restrictions for HVDC interconnectors and production plans (see sections 3, 4.1 and 4.2) and the existing possibilities for the TSOs to coordinate ramping between production plans (see section 4.3) limit large FRCE and frequency deviations and contributes to that the frequency and FRCE quality target parameters will be fulfilled. Consequently, the TSOs conclude that it is required to keep the existing ramping restrictions and coordination possibilities. Therefore, the TSOs propose the same ramping restrictions and coordination possibilities as currently applied.

This results in the following text for Article 3 and 4 of the Proposal:

Article 3 – Ramping restrictions for the active power output of HVDC interconnectors

1. For the NorNed, Estlink 1, Estlink 2, Vyborg, Konti-Skan, Kontek, Great Belt, Baltic Cable, NordBalt, SwePol Link and Skagerrak HVDC interconnectors the maximum gradient for change in flow is 30 MW/min;
2. The changes to the trading plans from one hour to the next in the energy market shall be not more than 600 MW on each of the following HVDC interconnectors: NorNed, Estlink, Vyborg, Kontek, Great Belt, Baltic Cable, NordBalt, SwePol Link, Skagerrak and Konti-Skan;

² In Norway and Sweden, it is sometimes possible to reschedule production steps within the hour if there are available production changes to reschedule

3. The changes to the trading plans from one hour to the next in the energy market shall be not more than 600 MW for the sum of the Skagerrak and Konti-Skan HVDC interconnectors;
4. In accordance with Article 137(3) of the SO Regulation, the restrictions in paragraph 1 to 3 shall not apply for imbalance netting, frequency coupling as well as cross-border activation of FRR and RR over HVDC interconnectors.

Article 4 – measures to support the fulfilment of the FRCE target parameter of the LFC block and to alleviate deterministic frequency deviations, taking into account the technological restrictions of power generating modules and demand units

1. When the hourly production plan of BRPs representing power generating modules in Finland, Norway and Sweden changes more than 200 MW at hour shift, these BRPs need to reschedule their plan with quarterly steps 15 minutes before hour shift, at hour shift and 15 minutes after hour shift in order to adjust the plans to better correspond to the consumption pattern. In Norway, the steps can be applied 30 minutes before the hour shift until 30 minutes after the hour shift. This obligation is not relevant in Denmark East due to the physical characteristics for production.
2. In case that planned production changes and planned HVDC exchanges around hour shift will impact the frequency in a way that cannot be entirely handled by control centres in the minutes before and after operating hour, the TSOs are allowed to request BRPs that represent power generating modules to advance or delay parts of planned production steps at the hour shift. The power schedules may be changed from 30 minutes before hour shift till 30 minutes after the hour shift.

7. Expected impact of the Proposal on the relevant objectives of the SO Regulation

The Proposal generally contributes to and does not in any way hamper the achievement of the objectives of Article 4 of the SO Regulation. In particular, the Proposal serves the objectives to:

- Article 4(1)(c) determining common load-frequency control processes and control structures;
- Article 4(1)(d) ensuring the conditions for maintaining operational security throughout the Union;
- Article 4(1)(e) ensuring the conditions for maintaining a frequency quality level of all synchronous areas throughout the Union.

The Proposal contributes to these objectives by specifying ramping restrictions for HVDC interconnectors and production plans. These ramping restrictions are required to maintain the operational security by reducing the risk for automatic Under Frequency Load Shedding (UFLS) and for system blackouts due to under or over frequency. Furthermore, the ramping restrictions are required to maintain the frequency quality level of the synchronous areas involved.

8. Timescale for the implementation

The TSOs shall implement the Proposal not later than when Nordic LFC block operational agreement enters into force in accordance with Article 119 of the SO Regulation.

9. Public consultation

Article 11 of the SO Regulation states that: *“TSOs responsible for submitting proposals for terms and conditions or methodologies or their amendments in accordance with this Regulation shall consult stakeholders, including the relevant authorities of each Member State, on the draft proposals for terms and conditions or methodologies listed in Article 6(2) and (3). The consultation shall last for a period of not less than one month.”*

This Proposal has been consulted in the period 1 July to 15 August 2018. The appendix to this document includes the views of stakeholders resulting from the consultations and explains if and how these views have been taken into account in the proposal.

Appendix: Results of Public Consultation

Article 11(3) of the SO Regulation states that: *“The TSOs responsible for developing the proposal for terms and conditions or methodologies shall duly take into account the views of stakeholders resulting from the consultations prior to its submission for regulatory approval. In all cases, a sound justification for including or not including the views resulting from the consultation shall be provided together with the submission of the proposal and published in a timely manner before, or simultaneously with the publication of the proposal for terms and conditions or methodologies.”*. Table 2 lists the views of stakeholders on this proposal resulting from the consultations and explains if and how these views have been taken into account in the Proposal.

Table 2: Views of stakeholders resulting from the consultations and explains if and how these views have been taken into account in the Proposal.

no.	organisation	comment	response TSOs
2	Danish Energy	<p>Overall, we are disappointed with the lack of detail and the absence of actual methodologies across all four proposals. We remind TSOs that, according to Article 6(3)(d-e) of the SO Regulation, the four proposals consulted upon are supposed to contain the actual methodologies and conditions to be included in the Synchronous Area and LFC block operational agreements when submitted for regulatory approval. We find these methodologies and conditions fundamentally lacking in the current proposals.</p> <p>We are also disappointed that these methodologies haven't been prepared in cooperation with the stakeholders and underline that stakeholders must be included in the preparatory process from an early phase.</p> <p>Nordic TSOs, operating one of the most closely integrated regional power systems in the world, should lead the way in European integration through much more ambitious and detailed proposals. The current proposals will delay the Nordic integration by postponing important decisions to the future implementation of a new Nordic balancing model. Furthermore, the proposals will render the Nordic countries non-compliant with the SO Regulation, which the TSOs explicitly recognize in the Explanatory Document on FRR dimensioning rules, by stating that “The proposal presented in section 6 of this document does not comply to the requirements in Article 157 of the SO Regulation in all aspects. [...] The TSOs have agreed on an approach for a new Nordic balancing model. Within the implementation process, the TSOs are developing a FRR dimensioning process which will comply with the requirements in Article 157 of the SO Regulation. Once defined, the TSOs will start an amendment process to this proposal.”</p> <p>We can only conclude that the Nordic TSOs are fully aware of the insufficiencies of the current proposals and find it odd they have nonetheless decided to consult upon them. Our major concern is that that Nordic TSOs may de facto shift decision-making on the relevant methodologies to their parallel initiative on new Nordic balancing - with weakly defined and non-legally binding implementation timelines – instead of complying to the process laid out in the SO Regulation. In order to fulfil the letter and spirit of the SO Regulation, and remain amongst the leaders of regional power system integration in European, we urge TSOs to take the following specific comments on each of the four proposals into account:</p>	<p>Comment acknowledged and did not result in a change of the proposals. As referred to by the respondent, the TSOs are in a process of changing their balancing model to fulfil the requirements in the SO Regulation and to reflect the needs for the Nordic situation. The Nordic TSOs have experienced that this process is very complex and time consuming and due to that the Nordic TSOs regret that it has not been possible to finalize the development work yet. However, earlier this year, the TSOs concluded a Cooperation Agreement including the main principles of the new Nordic balancing model and an initial schedule for implementation. At this moment, the TSOs pay a big effort in detailing the new Nordic balancing model. Since the TSOs want to do this carefully and also want to involve stakeholders in the development, the TSOs require more time than originally allowed by the SO Regulation. The TSOs will also like to stress the fact that operational agreements have to reflect the actual operational arrangements and in general not some future concept. Accordingly, the proposals mainly describe the existing situation. Once the Nordic balancing model has been developed, the TSOs will start an amendment process, in accordance with the relevant rules in the SO Regulation. A time plan for the amendments will shortly be discussed with the NRAs and all stakeholders will be informed. Needed implementation time for TSOs and other stakeholders will also have to be considered.</p>

6	Danish Energy	<p><i>Ramping restrictions for active power output</i></p> <p>The current proposal continues the ramping restrictions currently in effect in the Nordic region despite an evident need to review the limits and methodologies due to changes in power system physics and market rules. A re-evaluation of the limits and methodologies, driven by the increasing number of HVDC connections, changing flow patterns and the introduction of the 15-minute imbalance settlement period, is likely to improve market efficiency by narrowing the gap between rules-based constraints and the physical reality of the system.</p> <p>We believe that the preparation of the current proposal has provided ample opportunity over the last year to evaluate and revise these ramping requirements in close consultation with market participants. Unfortunately, while fully recognizing the need for revisions, TSOs have chosen not to exploit this opportunity but rather postpone decisions to their future Nordic balancing model development process. According to the Explanatory Document “Recent and future development with increased number of HVDC connections, changed flow pattern and the introduction of an ISP of 15 minutes requires that the limits, ramping periods and the methodology to determine these limits are re-evaluated in the new Nordic balancing model development process.”</p> <p>We are disappointed that TSOs have chosen such a defensive approach and urge TSOs to reconsider it by including in the final proposal for Article 3 a description of future methodologies to determine ramping limits and periods as well as actual ramping restrictions for active power output of HVDC interconnectors</p>	Comment acknowledged and did not result in a change of the proposal. The TSOs refer to response to item no. 2.
7	Danish Energy	<p>Furthermore, we do not support Article 4(2) allowing TSOs to “request BRPs to advance or delay parts of planned production steps at the hour shift”. It is unclear in terms of the criteria applied for TSO interference as, according to the article, it is apparently sufficient that production changes or HVDC exchanges will impact the frequency “[...] in a way that cannot be entirely handled by control centres [...]”. This is hardly an objective and transparent criterion for interference in the market and we suggest that it is removed or clarified in the final text. Additionally, Article 4(2) is unclear as to how market participants should respond to – and will be compensated for – such request. If there is a need for such a service in Finland, Norway or Sweden, we believe that it should be procured in a market in which all market participants are allowed to participate</p>	Comment acknowledged and did not result in a change of the proposal. The TSOs recognise the issues raised by the respondent and agree that these rules are not (completely) market based and may lack transparency. However, the TSOs note that the proposal describes the existing rules which are absolutely required to balance the Nordic synchronous area, especially at hour shifts with large production and import/export steps. Consequently, the TSOs will take the issues raised into account in the development of the new Nordic Balancing model (see chapter 5 of the Explanatory document). The TSOs refer to response to item no. 2.
8	Danish Energy	<p>Finally, Article 5 on Publication and Implementation is missing in the current proposal</p>	Comment acknowledged and resulted in the inclusion of Article 5.
12	Danish Energy	<p>In sum, we are surprised and disappointed that TSOs evade the SO Regulation requirements and submit four proposals with little actual substance for consultation.</p>	Comment acknowledged and did not result in a change of the proposals. The TSOs confirm that in the

		We strongly urge TSOs to start discussions with stakeholders and significantly revise the four proposals in line with our comments above, most importantly by adding substance and details on the envisaged methodologies in order to bring them into compliance with the SO Regulation, before submitting them for final NRA approval.	development process of the new Nordic balancing model, stakeholder involvement is of paramount importance.
14	Energy Norway - Association	<p>While Energy Norway regrets that the topics of this consultation has not been agreed upon within the NBC, we recognize that since the NBC represents a fundamentally new way of balancing the Nordic synchronous system, and the Nordic TSOs have different viewpoints, the development process is complex and time-consuming and not all aspects have been concluded up to this point. But given both the importance and complexity of the NBC and the requirements given by the SOGL, it is important that the TSOs increase the transparency and involvement related to the development and implementation of the NBC going forward. This will require a more proactive involvement of stakeholders in the development and implementation process. Among other things, the TSOs should justify and explain working plans, time-tables and SOGL compliance issues, challenges and opportunities for market players and implementation strategy. A step by step implementation of NBC is a probable starting point given the complexity and need to gain experience.</p> <p>Up to now the stakeholders have not been sufficiently involved, and a continuation of this practice will not only hurt the implementation of the NBC but may also backfire on the TSOs in the long run.</p>	Comment acknowledged and did not result in a change of the proposals. The TSOs confirm that the development process is complex and time-consuming and that not all aspects have been concluded up to this point. The TSOs further confirm that stakeholder involvement is crucial in the development of the new Nordic Balancing model and will be an important part of the development process.
18	Finnish Energy	<p>Overall, we are disappointed with the lack of detail and absence of actual methodologies across all four proposals. According to Article 6(3) (d-e) of the SOGL, the four proposals consulted upon are supposed to contain the actual methodologies and conditions to be included in the Synchronous Area and LFC block operational agreements when submitted for regulatory approval. We find these methodologies and conditions fundamentally lacking in the current proposals and hence that the proposals are not compliant with SOGL We are also disappointed that these methodologies haven't been prepared in cooperation with the stakeholders and underline that stakeholders must be included in the preparatory process from an early phase.</p> <p>The current proposals will delay the Nordic integration by trying to postpone important decisions to the future implementation of a new Nordic balancing model. Furthermore, the proposals will render the Nordic countries non-compliant with the SOGL, which the TSOs explicitly recognize in the Explanatory Document on FRR dimensioning rules, by stating that "The proposal presented in section 6 of this document does not comply to the requirements in Article 157 of the SO Regulation in all aspects. [...] The TSOs have agreed on an approach for a new Nordic balancing model. Within the implementation process, the TSOs are developing a FRR dimensioning process which will comply with the requirements in Article 157 of the SO Regulation. Once defined, the TSOs will start an amendment process to this proposal."</p>	<i>The TSOs refer to their response to item no. 2.</i>

		<p>We can only conclude that the Nordic TSOs are fully aware of the insufficiencies of the current proposals and find it odd they have nonetheless decided to consult upon them. Our major concern is that that Nordic TSOs are about to shift decision-making on the relevant methodologies to their parallel initiative on new Nordic balancing - with weakly defined and non-legally binding implementation timelines – instead of complying to the process laid out in the SOGL.</p> <p>For to follow SOGL, and remain amongst the leaders of regional power system integration in European, we urge TSOs to take the following specific comments on each of the four proposals into account:</p>	
20	Finnish Energy	<p><i>Ramping restrictions for active power output</i></p> <p>The current proposal continues the ramping restrictions currently in effect in the Nordic region despite an evident need to review the limits and methodologies due to changes in power system physics and market rules. A re-evaluation of the limits and methodologies, driven by the increasing number of HVDC connections, changing flow patterns and the introduction of the 15-minute imbalance settlement period, is likely to improve market efficiency by narrowing the gap between rules-based constraints and the physical reality of the system.</p> <p>We believe that the preparation of the current proposal has provided ample opportunity over the last year to evaluate and revise these ramping requirements in close consultation with market participants. Unfortunately, while fully recognizing the need for revisions, TSOs have chosen not to exploit this opportunity but rather postpone decisions to their future Nordic balancing model development process. According to the Explanatory Document “Recent and future development with increased number of HVDC connections, changed flow pattern and the introduction of an ISP of 15 minutes requires that the limits, ramping periods and the methodology to determine these limits are re-evaluated in the new Nordic balancing model development process.”</p> <p>We are disappointed that TSOs have chosen such a defensive approach and urge TSOs to reconsider it by including in the final proposal for Article 3 a description of future methodologies to determine ramping limits and periods as well as actual ramping restrictions for active power output of HVDC interconnectors.</p> <p>Furthermore, we do not support Article 4(2) allowing TSOs to “request BRPs to advance or delay parts of planned production steps at the hour shift”. It is unclear in terms of the criteria applied for TSO interference as, according to the Article, it is apparently sufficient that production changes or HVDC exchanges will impact the frequency “[...] in a way that cannot be entirely handled by control centres [...]”. This is hardly an objective and transparent criterion for interference in the market and we suggest that it is removed or clarified in the final text. Additionally, Article 4(2) is unclear as to how market participants should respond to – and will be compensated for – such request. Finally, Article 5 on Publication and Implementation is missing in the current proposal.</p>	<i>The TSOs refer to their response to item no. 6, 7 and 8.</i>

23	Finnish Energy	In sum, we are surprised and disappointed that TSOs seemingly have chosen to evade the SOGL requirements and submit four proposals with little actual substance for consultation. We strongly urge TSOs to significantly revise the four proposals in line with our comments above, most importantly by adding substance and details on the envisaged methodologies in order to bring them into compliance with the SOGL, before submitting them for final NRA approval.	<i>The TSOs refer to their response to item no. 12.</i>
28	Kemijoki Oy	Regarding "7. Ramping restrictions for active power output.pdf " - In general, the application of ramping restrictions might be good to the system.	Comment acknowledged and did not result in a change in the proposal.
29	Kemijoki Oy	- Article 4.2: Do the TSO-requests get mixed up with the imbalance actions of a BRP at the end of an hour? How is that requested regulation priced if compared to imbalance price? How does this affect the procurement of mFRR?	Comment acknowledged and did not result in a change in the proposal. The TSOs note that the commercial aspects of these arrangements are covered on national levels in the 'Terms and Conditions'.
32	Swedenergy	Overall, we like to raise our concerns with the level of detail in the current proposals. According to Article 6(3)(d-e) of the SO Regulation the four proposals consulted should include descriptions of methodologies and conditions to be included in the Synchronous Area and LFC block operational agreements when submitted for regulatory approval. In our view the current proposals are quite general, and the methodologies and conditions still need to be developed and specified. It is important to take part of these details to be fully able to assess consequences and costs. We are aware of the time constraints and other ongoing processes linked to the development of these methodologies and conditions. Nevertheless, we would have liked to see that the methodologies had been prepared in cooperation with the stakeholders. We would like to underline that stakeholders must be included in the preparatory process from an early phase. Nordic TSOs have the possibility to lead the way in European integration. The current proposals can lead to a delay of Nordic integration by postponing important decisions to the future implementation of a new Nordic balancing model, for which the detailed implementation deadlines are unknown and not legally-binding. We therefore strongly encourage the TSOs to start discussions with stakeholders and to revise the four proposals in line with our comments, before submitting them for final NRA approval. We have the following specific comments to each of the four proposals:	<i>The TSOs refer to their response to item no. 2.</i>
36	Swedenergy	<i>Ramping restrictions for active power output</i> The current proposal continues the ramping restrictions currently in effect in the Nordic region. We believe that there is need to review the limits and methodologies due to changes in power system physics and market rules. A re-evaluation of the limits and methodologies, driven by the increasing number of HVDC connections, changing flow patterns and the introduction of the 15-minute imbalance settlement period, is likely to	<i>The TSOs refer to their response to item no. 6 and 8</i>

	<p>improve market efficiency by narrowing the gap between rules-based constraints and the physical reality of the system.</p> <p>This is also supported by the TSOs in the Explanatory Document stating that “Recent and future development with increased number of HVDC connections, changed flow pattern and the introduction of an ISP of 15 minutes requires that the limits, ramping periods and the methodology to determine these limits are re-evaluated in the new Nordic balancing model development process.”</p> <p>We therefore encourage the TSOs to include in the final proposal for Article 3 a description of future methodologies to determine ramping limits and periods as well as actual ramping restrictions for active power output of HVDC interconnectors.</p> <p>We also notice that Article 5 on Publication and Implementation is missing in the current proposal.</p>	
--	--	--